

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION



UNITED STATES OF AMERICA,  
Plaintiff,

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§

Criminal No.

**H-07-121**

v.

VERNON ALBERT RICHARDSON, III,  
Defendant

UNITED STATES COURTS  
SOUTHERN DISTRICT OF TEXAS  
FILED

MAR 29 2007

**Indictment**

MICHAEL N. MILBY, CLERK OF COURT

The Grand Jury charges:

**Count I**

(Tax Evasion - 26 U.S.C. 7201)

That on or about February 26, 2001, in the Houston Division of the  
Southern District of Texas,

**Vernon Albert Richardson, III,**

defendant herein, did willfully attempt to evade and defeat a large part of the  
income tax due and owing by him to the United States of America for the calendar  
year 2000, by preparing and causing to be prepared, and by signing and causing to  
be signed, a materially false and fraudulent U.S. Individual Income Tax Return,  
form 1040, which was filed with the Internal Revenue Service, wherein he stated  
that his taxable income for 2000 was \$57,886.00, and that the amount of tax due  
and owing thereon was \$9,906.00, whereas, as he then and there well knew and

believed, his taxable income for 2000 was approximately \$297,289.13, upon which taxable income there was owing to the United States of America a substantially higher income tax of approximately \$85,510.01.

In violation of Title 26, United States Code, Section 7201.

**Count II**  
(Tax Evasion - 26 U.S.C. 7201)

That on or about March 18, 2002, in the Houston Division of the Southern District of Texas,

**Vernon Albert Richardson, III,**

defendant herein, did willfully attempt to evade and defeat a large part of the income tax due and owing by him to the United States of America for the calendar year 2001, by preparing and causing to be prepared, and by signing and causing to be signed, a materially false and fraudulent U.S. Individual Income Tax Return, form 1040, which was filed with the Internal Revenue Service, wherein he stated that his taxable income for 2001 was \$7,179.00, and that the amount of tax due and owing thereon was \$2,179.00, whereas, as he then and there well knew and believed, his taxable income for 2001 was approximately \$95,999.12, upon which taxable income there was owing to the United States of America a substantially higher income tax of approximately \$26,832.15.

In violation of Title 26, United States Code, Section 7201.

**Count III**  
(Tax Evasion - 26 U.S.C. 7201)

That on or about April 7, 2003, in the Houston Division of the Southern District of Texas,

**Vernon Albert Richardson, III,**

defendant herein, Texas, did willfully attempt to evade and defeat a large part of the income tax due and owing by him to the United States of America for the calendar year 2002, by preparing and causing to be prepared, and by signing and causing to be signed, a materially false and fraudulent U.S. Individual Income Tax Return, form 1040, which was filed with the Internal Revenue Service, wherein he stated that his taxable income for 2002 was \$0, and that the amount of tax due and owing thereon was \$0, whereas, as he then and there well knew and believed, his taxable income for 2002 was approximately \$51,418.59, upon which taxable income there was owing to the United States of America a substantially higher income tax of approximately \$20,378.04.

In violation of Title 26, United States Code, Section 7201.

**Count IV**  
(Tax Evasion - 26 U.S.C. 7201)

That on or about February 23, 2004, in the Houston Division of the Southern District of Texas,

**Vernon Albert Richardson, III,**

defendant herein, did willfully attempt to evade and defeat a large part of the income tax due and owing by him to the United States of America for the calendar year 2003, by preparing and causing to be prepared, and by signing and causing to be signed, a materially false and fraudulent U.S. Individual Income Tax Return, form 1040, which was filed with the Internal Revenue Service, wherein he stated that his taxable income for 2003 was \$0, and that the amount of tax due and owing thereon was \$0, whereas, as he then and there well knew and believed, his taxable income for 2003 was approximately \$91,744.64, upon which taxable income there was owing to the United States of America a substantially higher income tax of approximately \$30,876.92.


In violation of Title 26, United States Code, Section 7201.

A True Bill:

Original Signature on File

Foreperson of Grand Jury

DONALD J. DeGABRIELLE, JR.  
UNITED STATES ATTORNEY

  
Charles J. Escher  
Assistant U.S. Attorney